

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 13 CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
JOHN R. WAGNER, M.D. FOR WAVE 13**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to John R. Wagner for Ethicon Wave 4, Dkt. 3617 (motion), Dkt. 3618 (memorandum in support) and Dkt. 3851 (reply brief) and Wave 6, Dkt. 4876 (motion), Dkt. 4879 (memorandum in support) and Dkt. 5044 (reply brief).

Plaintiffs respectfully request that the Court exclude John R. Wagner's testimony, for the reasons expressed in the Waves 4 and 6 briefing. This notice applies to the following Wave 13 cases identified in Exhibit A attached hereto.

Dated: December 12, 2019

Respectfully submitted,

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## **EXHIBIT A**

Cannon, Helen	15cv05858
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 12, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett  
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